ASH GROVE CEMENT COMPANY

"WESTERN REGION"

January 26, 2006

Puget Sound Clean Air Agency
Attn: Fred Austin
110 Union Street, Suite 500
Seattle, Washington 98101

VIA CERTIFIED U.S. MAIL, No. 7002 2410 0004 7307 2256

Re: Submittal of 40 CFR § 63.10 (e) (3) "Summary Report -- Gaseous Emission and Continuous Monitoring System Performance", and §63.1354 (b) (4), Ash Grove Cement Company Plant – Seattle Washington

Dear Mr. Austin:

In accordance with the provision of § 63.10 (e) (3), (e)(3)(v)-(viii) and §63.1354(b)(8)-(10), Ash Grove Cement Company is submitting this semi annual report entitled - "Summary Report -- Gaseous and Continuous Monitoring System Performance".

Contact Person: Gerald J. Brown
Safety and Environmental Manager
3801 East Marginal Way South
Seattle, Washington 98134-1113
(206) 623-5596

63.10 (e)(3)(vi)(A): Company name and address of the affected source: Ash Grove Cement Company, 3801 East Marginal Way South, Seattle WA 98134

63.10 (e)(3)(vi)(B): An identification of each hazardous air pollutant monitored at the affected source: Dioxin/Furans, Ash Grove monitors the kiln baghouse inlet temperature as a parametric indicator of dioxin/furan emissions.

63.10 (e)(3)(vi)(C): The beginning and ending dates of the reporting period:
July 1, 2006 to December 31, 2006.

63.10 (e)(3)(vi)(D): A brief description of the process units: The in-line kiln/raw mill system includes an ID fan, the main baghouse dust collector, the Raw Mill, preheater/precalciner, and rotary kiln. The system converts dry raw materials prepared in the raw mill into cement clinker by heating it to the point of incipient infusion in the preheater/ precalciner and kiln. New chemical compounds are formed in the clinkering process that produce the hydraulic properties of portland cement. The system is heated by fossil fuels that are combusted at the lower or clinker discharge end of the inclined rotary kiln and in the precalciner and tire derived fuel is introduced to the system at the precalciner. The flow of combustion products is countercurrent to the flow of raw materials down the kiln.

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63.10 (e)(3)(vi)(E): The emission and operating parameter limitations specified in the relevant standard(s):

Dioxin/Furans: 0.4 ng/dscm if APCD inlet temperature <= 204 degrees C, 0.2 ng/dscm of APCD inlet temperature > 204 degrees C.

Kiln operating limit: Temperature limits for the kiln are 175 degrees C/347 degrees F (raw mill on) and 256 degrees C/492 degrees F (raw mill off). Per letter dated October 18, 2002, the coal mill operating limits at the inlet to the coal mill baghouse are 93.3 degrees C/200 degrees F.

63.10 (e)(3)(vi)(F): The monitoring equipment manufacturer(s) and model number(s):

Location	Transmitter		Detector	
	Manufacturer	Model	Manufacturer:	Model
Main baghouse	Rosemount	3044C	Eustis/Pyrocom	MAJ73U12000D
Coal Mill #1	Rosemount	3144C	Eustis/Pyrocom	RTA13180T000
Coal Mill #2	Rosemount	3144C	Eustis/Pyrocom	RTA13180T000

63.10 (e)(3)(vi)(G): The date of the latest CMS certification or audit: 11/09/2006

63.10 (e)(3)(vi)(H): The total operating time of the affected sources during the reporting period:

Total operating time for the Kiln. **3504.6** Hours

Total operating time for the Raw Mill. **2920.8** Hours

63.10 (e)(3)(vi)(I): An emission data summary (or similar summary if the owner or operator monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes;

CMS Excess Emission and Parameter Exceedences Data Summary				
1. Duration of Excess Emission (EE) or Parameter Exceedences (PE) in Reporting Period due to:*				
	Kiln	Raw Mill	Coal Mill #1	Coal Mill #2
a. Startup/Shutdown	0.0	0.0	0.0	0.0
b. Control Equipment Problems	0.0	0.0	0.0	0.0
c. Process Problems	0.0	0.0	0.0	0.0
d. Other Known Causes	0.0	0.0	0.0	0.0
e. Unknown Causes	0.0	0.0	0.0	0.0
1. Total Duration of Excess Emissions	0.0	0.0	0.0	0.0
2. $\frac{\text{Total EE (PE) Duration} \times 100}{\text{Total Source Operating Time}} =$	0.0	0.0	0.0	0.0

*Unit of Time in hours for all temperatures.

†If the total duration of excess emissions or process parameter control exceedences for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Administrator. If the total duration of excess emissions or process control system parameter exceedences for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted.
Regulatory Citation: 40 CFR 63.10(e)(3)(vi)(A)-(M)

63.1354(b)(9)(i). All exceedences of maximum control device inlet temperature specified in 63.1344(a) and (b).

Event	From	To
None		

63.10(e)(3)(vi)(J). A CMS performance summary (or similar summary if the owner or operator monitors control system parameters), including the total CMS downtime during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, nonmonitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes;

CMS Performance Summary*				
1.CMS Downtime in reporting period due to: *				
	Kiln	Raw Mill	Coal Mill #1	Coal Mill #2
a. Monitoring Equipment Malfunctions	0.0	0.0	0.0	0.0
b. Non-monitoring Equipment Malfunctions	0.0	0.0	0.0	0.0
c. Quality Assurance/Quality Control Calibrations	5.0	5.0	6.0	6.0
d. Other Known Causes	0.0	0.0	0.0	0.0
e. Other Unknown Causes	0.0	0.0	0.0	0.0
2.Total CMS Downtime	5.0	5.0	6.0	6.0
3.Total Duration of excess emissions x (100) / Total source opperating time †	0.0	0.0	0.0	0.0

*Unit of Time in hours for all temperatures.
†If the total duration of excess emissions or process parameter control exceedences for the reporting period is less than 1 percent of the total operating time for the reporting period, and CMS downtime for the reporting period is less than 5 percent of the total operating time for the reporting period, only the summary report shall be submitted, and the full excess emissions and continuous monitoring system performance report need not be submitted unless required by the Administrator. If the total duration of excess emissions or process control system parameter exceedences for the reporting period is 1 percent or greater of the total operating time for the reporting period, or the total CMS

downtime for the reporting period is 5 percent or greater of the total operating time for the reporting period, both the summary report and the excess emissions and continuous monitoring system performance report shall be submitted.
Regulatory Citation: 40 CFR 63.10(e)(3)(vi)(A)-(M)

63.10 (e)(3)(vi)(K): A description of any changes in CMS, processes, or controls since the last reporting period.

No changes were made to the processes, or controls since the last reporting period.

63.1354(b)(9)(ii): All failures to calibrate thermocouples and other temperature sensors as required under 63.1350(f)(7):

There were no failures to calibrate thermocouples for the Kiln /Raw Mill during the reporting period. The Facility Portland Cement NESHAP Procedure No. SECMEP–003 required by EU 1.22 conflicted with EU 1.20. This resulted in the quarterly calibration being performed on the Resistance Thermal Detectors (RTD) located at the exit rather than the inlet to each coal mill baghouse as required. The RTD system is a "continuous monitor used to monitor the exhaust gases" from the coal mill. Quarterly calibrations of the coal mill baghouse RTDs were performed in accordance with Facility Portland Cement NESHAP Procedure No. SECMEP–003. This procedure identified the RTDs at the Coal Mill Baghouse exit for quarterly calibration. The correct identification would have been the RTDs at the Coal Mill exit or those at the inlet to each coal mill baghouse. The AOP Section II.B.13 that states: Ash Grove shall calibrate, maintain and continuously operate a temperature monitor at the inlet to each coal mill baghouse. While calibration checks were performed on the RTD at each coal mill baghouse exit, continuous temperature monitoring was recorded correctly from the inlet to each coal mill baghouse. Upon discovery, calibration checks of the RTDs at the Coal Mill exit showed that both are reading accurately. The RTD devices by their nature do not require calibration adjustments or maintenance to retain their performance accuracy. As such, there is no reason to believe that the temperature measurements recorded historically are not accurate.

63.1354(b)(9)(iii): All failures to maintain the activated carbon injection rate, and the activated carbon injection carrier gas flow rate or pressure drop, as applicable, as required under 63.1344 (c):

This requirement is not applicable to the Seattle kiln system at this time.

KILN COMBUSTION INSPECTION REPORT

63.1354(b)(9)(iv). The results of any combustion system inspections conducted within the reporting period under 63.1350(i):

There were no combustion system inspections performed during this reporting period

63.1354(b)(9)(v): All failures to comply with any provision of the operation and maintenance plan developed in accordance with 63.1350 (a):

None

63.1354(b)(4). As required by 63.10(d)(5), if the actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 63.6(e)(3), the owner or operator shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports.
-Actions taken for a startup, shutdown, or malfunction during the reporting period were consistent with the startup, shutdown, and malfunction plan.

PERIODIC STARTUP, SHUTDOWN, AND MALFUNCTION REPORT

63.10(d)(5)(i). Periodic startup, shutdown, and malfunction reports

If actions taken by an owner or operator during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan (see § 63.6(e)(3)), the owner or operator shall state such information in a startup, shutdown, and malfunction report. Actions taken to minimize emissions during such startups, shutdowns, and malfunctions shall be summarized in the report and may be done in checklist form; if actions taken are the same for each event, only one checklist is necessary. Such a report shall also include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. Reports shall only be required if a startup or shutdown caused the source to exceed any applicable emission limitation in the relevant emission standards, or if a malfunction occurred during the reporting period.

Listed below are the number, duration, and brief description of each startup, shutdown or malfunction that caused the source to exceed any applicable emission limitation.

ASH GROVE CEMENT COMPANY
PERIODIC STARTUP, SHUTDOWN& MALFUNCTION SEMIANNUAL REPORT
Reporting period: July 1 – December 31, 2006

Entity/System	Description
316.MR1 **Raw Mill**	**Startups: 0** Startup of the Raw Mill commences when 317.FZ3 and 411.FZ1 dedusting filters and rotary feeder 411.RF3 are started as part of the startup sequence.)
	Shutdowns: 0 Shutdown of the Raw Mill commences when Raw Mill 316.MR1 is stopped.) **Malfunctions: 0**
416.KD1 **Kiln**	**Startups: 0** Startup of the Kiln commences when the main baghouse dust collector fan 413.FZ1 is started as part of the kiln startup sequence.)
	Shutdowns: 0 Shutdown of the Kiln commences when fuel flow to the main burner pipe is terminated.) **Malfunctions: 0**

I certify that the information contained in this report is true, accurate, and complete.

Name: Craig Puljan, Plant Manager

Signature GARY

Date: 1/25/07